

STATE OF INDIANA)
) SS:
COUNTY OF SHELBY)
)

IN THE SHELBY COURT

CAUSE NO. 73C01-2208-CT-000028

HELEN MCROBERTS

VS.

SHAQUILL LOGAN and
FREIGHTSTAR EXPEDITED LLC

COMPLAINT FOR DAMAGES

Come now the Plaintiff, Helen McRoberts, by counsel, Ken Nunn Law Office, and for her cause of action against the Defendants, Shaquill Logan and Freightstar Expedited LLC, allege and state as follows:

STATEMENT AND JURISDICTION

1. This is a clear liability collision in which Defendants' 2016 Volkswagen tractor and attached trailer, was negligently driven by Defendant, Shaquill Logan, causing a collision with the vehicle driven by Plaintiff, Helen McRoberts. As a result of the collision, Plaintiff has incurred medical expenses, lost wages, property damage and other special expenses in an amount to be proven at trial of this cause.

2. Jurisdiction and venue are appropriate in Shelby County, Indiana, as said collision occurred within the boundaries of Shelby County, State of Indiana.

FIRST CAUSE OF ACTION

NEGLIGENCE OF TRUCK DRIVER

3. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 2 above as if fully restated verbatim.

4. On or about May 4, 2022, Defendant Shaquill Logan negligently drove a tractor-trailer striking the vehicle driven by Plaintiff, Helen McRoberts.

5. Defendant Shaquill Logan had a duty to operate his tractor trailer in a safe and reasonable manner.

6. Defendant Shaquill Logan failed in the above mentioned duties and is therefore negligent.

7. Defendant Shaquill Logan's negligence was the direct and proximate cause of Plaintiff's injuries.

8. Plaintiff Helen McRoberts' injuries and damages are permanent.

9. As a direct and proximate result of Shaquill Logan's negligence, Helen McRoberts has suffered lost wages

10. Plaintiff, Helen McRoberts, has incurred medical bills for the treatment of her injuries directly resulting from this collision.

11. As a direct and proximate result of Shaquill Logan's negligence, Helen McRoberts has experienced physical and mental pain and suffering, lost wages and property damage and has lost the ability to perform usual activities, resulting in a diminished quality of life.

SECOND CAUSE OF ACTION

NEGLIGENCE PER SE OF TRUCK DRIVER

12. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 11 above as if fully restated verbatim

13. Shaquill Logan violated state and federal statutes and regulations including but not limited to Title 9 of the Indiana Code.

14. Defendant Shaquill Logan's statutory violations directly and proximately caused Plaintiff's damages and injuries.

15. Defendant Shaquill Logan is negligent per se based on these statutory and regulatory violations.

THIRD CAUSE OF ACTION

RESPONDEAT SUPERIOR OF TRUCK COMPANY

16. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 15 above as if fully restated verbatim.

17. Defendant Shaquill Logan was the employee, agent, servant, or independent contractor for Freightstar Expedited LLC. Accordingly, Freightstar Expedited LLC is vicariously liable for the acts of Defendant Shaquill Logan for the causes of action above.

WHEREFORE, the Plaintiff, Helen McRoberts, by counsel, the Ken Nunn Law Office, demands judgment against the Defendants, Shaquill Logan and Freightstar Expedited LLC, for permanent injuries in a reasonable amount to be determined at the trial of this cause, for medical expenses, lost wages, property damage and other special expenses, court costs and all other just and proper relief in the premises.

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REQUEST FOR TRIAL BY JURY

Comes now the plaintiff, by counsel, Ken Nunn Law Office, and requests that this matter be tried by jury pursuant to Trial Rule 38.

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